

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK  
(SYRACUSE)

UNITED STATES OF AMERICA

Plaintiff,

v.

Case No. 5:15-cr-00081-NAM

ANDREW RAYMOND, and  
BRIAN REQUENA,

Defendants.

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**DEFENSE DISCLOSURE OF EXPERT WITNESS INFORMATION**

COME NOW Defendants, ANDREW RAYMOND and BRIAN REQUENA,  
by and through their respective undersigned counsel of record, and file the following  
documents with regard to the defense expert witnesses to be called at trial:

1. First Amended Summary of Expert Opinion and Bases (Mark Erickson, Ph.D., Professor of Chemistry) dated September 5, 2016 (24 pages);
2. Vita of Mark Erickson, Ph.D., Professor of Chemistry (9 pages);
3. First Amended Affidavit of Dr. Anthony P. DeCaprio (24 pages) dated August 25, 2016;

4. Vita of Anthony P. DeCaprio, Ph.D., DABT (28 pages).

The above documents are filed in compliance with Federal Rules of Criminal Procedure 16(E) and Federal Rules of Evidence 701 et seq.

Dated: September 14, 2016

Respectfully submitted,

/s/ Anthony P. Brooklier

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